Ms. Bess Y. Hwang W.R. Grace and Co. - Conn. 5215 Kennedy Avenue East Chicago, Indiana 46312

Re: **089-14372** 

Notice-only change to MSOP 089-8847-00310

Dear Ms. Hwang:

W.R. Grace and Co. - Conn. was issued a permit on March 30, 2001 for a sodium silicate solution and Ludox manufacturing source. A letter requesting changes to the permit was received by the Office of Air Quality on April 24, 2001. Pursuant to the provisions of 326 IAC 2-6.1-6 the permit is hereby revised as follows (deleted language appears as strikeouts, new language appears in **bold**):

Upon the Permittees request, two (2) names have been added to the list of authorized individuals as follows:

#### A.1 General Information [326 IAC 2-5.1-3(c)] [326 IAC 2-6.1-4(a)]

The Permittee owns and operates a stationary a sodium silicate solution and Ludox manufacturing source.

Authorized Individuals: Patricia M. Winkley, Bess Y. Hwang and Charles J. Tuskan

Source Address: 5215 Kennedy Avenue, East Chicago, Indiana 46312 Mailing Address: 5215 Kennedy Avenue, East Chicago, Indiana 46312

Phone Number: 219-391-4647

SIC Code: 2819 County Location: Lake

County Status: Nonattainment for PM<sub>10</sub>, SO<sub>2</sub> and Ozone

Attainment area for all other criteria pollutants

Source Status: Minor Source Operating Permit

Minor Source, under PSD and Emission Offset Rules; Minor Source, Section 112 of the Clean Air Act

Facility descriptions in Section A.2 and the appropriate Emission Unit Description Boxes of the D sections have been further explained and/or corrected. The Permittee has indicated that there is no particulate control device associated with the sand transfer and storage operations, identified as EU-08. The control device was not required to be in operation by the MSOP. Therefore, the change is only a change in descriptive information. Changes are as follows:

# A.2 Emissions Units and Pollution Control Equipment Summary

This stationary source is approved to operate the following emissions units and pollution control devices:

(a) One (1) Sodium Silicate Furnace, known as EU-01, installed in 1902, **using natural gas as fuel and exhausted exhausting** through stack S/V 01, maximum capacity: 9,600 pounds of raw material per hour and 25 million British thermal units per hour.

- (b) Three (3) Stone Johnston Boilers, known as EU-02, EU-03 and EU-04, installed in March 1986, **fired by natural gas and** exhausted through stacks S/V 02, S/V03 and S/V04, respectively, maximum capacity: 26.46 million British thermal units per hour, each.
- (c) Emergency generators as follows:
  - (1) One (1) EVC backup generator, identified as EU-05, **installed in 1974**, fired by natural gas, capacity: 0.5 million British thermal units per hour.
  - One (1) Powerhouse backup generator, identified as EU-06, **installed in 1971 and relocated within the source in 1984,** fired by natural gas, capacity: 0.5 million British thermal units per hour.
- (d) Lime transfer and storage operations, identified as EU-07, with a 400 cubic foot storage silo and handled by pneumatic transfer, equipped with a baghouse for particulate control, maximum throughput: 0.056 ton per hour.
- (e) Sand transfer and storage operations, identified as EU-08, with a 20,409 cubic foot storage silo and handled by a bucket elevator, equipped with filter bags for particulate control, maximum throughput: 4.2 tons per hour.
- (f) Soda Ash transfer and storage operations, identified as EU-09, with a 4,500 cubic foot storage silo and handled by pneumatic transfer, equipped with filter bags for particulate control, maximum throughput: 2.2 tons per hour.
- (g) Eight (8) sodium silicate solution storage tanks, identified as EU-10, containing only inorganic chemicals with negligible vapor pressures, capacities: 23,000 through 160,000 gallons, with solution transported to three (3) railcar loading docks and three (3) tank truck loading docks.
- (h) Nineteen (19) Ludox colloidal silica storage tanks, identified as EU-11, containing organic and inorganic chemicals with negligible vapor pressures, capacities: 5,000 through 75,000 gallons, with Ludox transported to one (1) railcar loading dock and three (3) tank truck loading docks.
- (i) The following tanks containing inorganic chemicals with negligible vapor pressures:
  - (1) One (1) aqua ammonia blowcase, identified as EU-12, installed in 1976, containing 29% aqua ammonia, capacity: 500 gallons.
  - One (1) ninety-three percent (93%) sulfuric acid storage tank, identified as EU-13, installed in 1973, capacity: 4,300 gallons.
  - One (1) ninety-three percent (93%) sulfuric acid storage tank, identified as EU-14, installed in 1963, capacity: 12,000 gallons.
  - (4) Three (3) spent regenerated acid tanks, identified as EU-15, installed in 1972, capacity: 33,000 gallons, each.
  - One (1) fifty percent (50%) caustic storage tank, identified as EU-16, constructed in 1990, containing 50% sodium hydroxide, capacity: 25,000 gallons.

- (6) One (1) fifty percent (50%) caustic storage tank, identified as EU-17, constructed in 1986, containing 50% sodium hydroxide, capacity: 4,000 gallons.
- (7) One (1) boiler feed oxygen scavenger, identified as EU-18, installed in 1994, capacity: 550 gallons.
- (8) One (1) boiler feed scale preventative, identified as EU-19, installed in 1994, capacity: 850 gallons.
- (9) One (1) spent one through three percent (1-3%) sulfuric acid tank, installed in 1986, capacity 8,900 gallons.
- (j) The following tanks containing organic chemicals with negligible vapor pressures:
  - (1) One (1) solvent parts cold cleaner, identified as EU-20, installed in 1996, containing petroleum distillate and using only nonhalogenated solvents, capacity: 30 gallons.
  - One (1) cationic polymer tank, identified as EU-21, installed in 1972, capacity: 4,000 gallons.
  - (3) One (1) gasoline storage tank, identified as EU-22, installed in 1991, capacity: 270 gallons.
  - (4) One (1) diesel storage tank, identified as EU-23, installed in 1991, capacity: 500 gallons.

The rule cite and a typographical error are corrected in Condition C.6 as follows:

### C.6 Permit Revocation [326 IAC 2-1.1-9]

Pursuant to 326 IAC 2-1.1-9(a)(Revocation of Permits), this permit **to** operate may be revoked for any of the following causes:

- (a) Violation of any conditions of this permit.
- (b) Failure to disclose all the relevant facts, or misrepresentation in obtaining this permit.
- (c) Changes in regulatory requirements that mandate either a temporary or permanent reduction of discharge of contaminants. However, the amendment of appropriate sections of this permit shall not require revocation of this permit.
- (d) Noncompliance with orders issued pursuant to 326 IAC 1-5 (Episode Alert Levels) to reduce emissions during an air pollution episode.
- (e) For any cause which establishes in the judgment of IDEM, the fact that continuance of this permit is not consistent with purposes of this article.

A typographical error in Condition C.9 is corrected as follows:

C.9 Nonattainment area particulate limitations; Lake County particulate matter contingency measures [326 IAC 6-1-11.2]

This source shall comply with the requirements of 326 IAC 6-1-11.2 (Nonattainment area particulate limitations; Lake County particulate matter contingency measures).

Condition C.18 has been revised to specify the address to which reports are submitted as follows:

- C.18 General Reporting Requirements [326 IAC 2-1.1-11] [326 IAC 2-6.1-2] [IC 13-14-1-13]
  - (a) The reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management Compliance Data Section, Office of Air Quality 100 North Senate Avenue, P. O. Box 6015 Indianapolis, Indiana 46206-6015

- (a) (b) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (b) (c) Unless otherwise specified in this permit, any semi-annual report shall be submitted within thirty (30) days of the end of the reporting period. The reports do not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) (d) All instances of deviations must be clearly identified in such reports. A reportable deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:
  - (1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or
  - (2) A malfunction as described in 326 IAC 1-6-2; or
  - (3) Failure to implement elements of the Preventive Maintenance Plan unless lack of maintenance has caused or contributed to a deviation.
  - (4) Failure to make or record information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter.

A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred or failure to monitor or record the required compliance monitoring is a deviation.

(d) (e) Any corrective actions or response steps taken as a result of each deviation must be clearly identified in such reports.

(e) (f) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period.

The last line of the Natural Gas-Fired Boiler Certification Form is deleted as follows:

Attach a signed certification to complete this report.

The source phone number on the Annual Notification Form is revised as follows:

#### <del>609 - 540 - 3536</del> **219-391-4647**

The Permittee also indicated that the emission factor used for  $PM_{10}$  emissions from the furnace is incorrect. The most conservative stack test result for  $PM_{10}$  emissions from the furnace is 99.99% of total particulate, instead of 99.59% of total particulate. Therefore, the potential to emit  $PM_{10}$  from the furnace is 3.72 pounds per hour, equivalent to 16.3 tons per year. Therefore, the furnace is still in compliance with all applicable rules. The total source potential to emit  $PM_{10}$  is 22.8 tons per year, instead of the 22.7 tons per year indicated in the Technical Support Document to MSOP 089-8847-00310, issued on March 30, 2001. There are no changes in the permit as a result of this change.

In addition to the changes made, the Permittee requested changes that have not been made. These changes and reasons why they were not made are as follows:

- (a) The Permittee requested that Condition B.1 be removed from the permit because it has been taken out of some permits. Condition B.1 has not been removed from any Minor Source Operating Permits at this time. Therefore, it has not been removed from this permit.
- (b) The Permittee requested that Condition C.2, Preventive Maintenance Plan, be removed from the permit since there are no Preventive Maintenance Plans required by any Section D. As stated in Condition C.2(a), "If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMP) after issuance of this permit..." Therefore, a Preventive Maintenance Plan (PMP) is only required if it is required by a Section D, and this condition will remain in the permit. The condition is required to stay in the permit because a new facility could be added to the source at some later date and a PMP may be required. This decreases the number of changes to the permit upon modification and lessens the likelihood of confusion.
- (c) The Permittee requested that the rule citation 326 IAC 2-1.1-1, Definitions, be added to many conditions in this permit. Condition B.2 states, "Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, any applicable definitions found in IC 13-11, 326 IAC 1-2, and 326 IAC 2-1.1-1 shall prevail." Therefore, the rule cite is not necessary and adding the rule cite would lead to confusion.
- (d) The Permittee requested that Condition C.6, Permit Revocation, be removed because W.R. Grace and Co. Conn. is not a major source. The requirements of 326 IAC 2-1.1-9 are applicable to all sources requiring permits, not only major sources. Therefore, Condition C.6 is not removed from this permit.

- (e) The Permittee requested that the rule cite for the definition of malfunction be added to the title of Condition C.14. That rule cite is included in the Condition C.14(d), which specified the definition of malfunction and is not included in the title of the conditions because it is only the cite for the definition and not a basis for the condition. The rule cites in the title of each condition are the basis for those conditions. Therefore, this change has not been made to the permit.
- (f) The Permittee has indicated that Condition C.14 does not contain a telephone or facsimile number for notifications. The facsimile number is on the Malfunction Report Form. Therefore, there is no change to this condition.
- (g) The Permittee requested that Condition C.15, Annual Emission Statement, be removed from the permit since the source is not a Part 70 source. As indicated on page 8 of 12 of the Technical Support Document for MSOP 089-8847-00310, issued on March 30, 2001, this source is subject to 326 IAC 2-6 (Emission Reporting), because it is located in Lake County and has the potential to emit more than ten (10) tons per year of NO<sub>x</sub>. Pursuant to this rule, the owner/operator of the source must annually submit an emission statement for the source. Therefore, this condition has not been removed.
- (h) The Permittee requested that Condition C.16, Monitoring Data Availability, be removed from the permit since there are no monitoring requirements in the permit. This Condition C.16(a) states, "...all observations, sampling, maintenance procedures, and record keeping, required as a condition of this permit shall be performed..." No monitoring or record keeping is required by this permit. However, if a future source modification results in the requirement of a Compliance Monitoring, this condition will already be part of the permit and a condition will be added to Section D requiring the monitoring. This decreases the number of changes to the permit upon modification and lessens the likelihood of confusion.
- (i) The Permittee requested a change in the rules cited for Condition C.18, General Reporting Requirements. The rule citations currently existing in the permit are correct.
- (j) The Permittee asked if 326 IAC 5-1 should be included in Condition D.4.2. Condition C.7 requires compliance with 326 IAC 5-1, and describes those requirements. Since Section C and 326 IAC 5-1 are referenced in Condition D.4.2, the requirements of 326 IAC 5-1 do not need to be specifically outlined in Condition D.4.2.
- (k) The Permittee asked if the Malfunction Report Form should specify an emission rate of 100 tons per year for  $NO_X$ , instead of 25 tons per year. A Minor Source Operating Permit is required if  $NO_X$  emissions are 25 tons per year or more. Therefore, the emission rate of 25 tons per year specified on the Malfunction Report Form is correct.

The Permittee also indicated that the potential to emit of Nickel should be 0.001 tons per year and not 0.003 tons per year, as specified in the Technical Support Document for MSOP 089-8847-00310, issued on March 30, 2001. This does not change the applicability of any rule. There are no additional changes to the permit as a result of this correction.

All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this letter and the following revised permit pages to the front of the original permit. An entire updated permit is provided for your convenience.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact CarrieAnn Ortolani, c/o OAQ, 100 North Senate Avenue, P.O. Box 6015, Indianapolis, Indiana, 46206-6015, at 631-691-3395 or in Indiana at 1-800-451-6027 (ext 631-691-3395).

Sincerely,

Paul Dubenetzky, Chief Permits Branch Office of Air Quality

Attachments CAO/MES

cc: File - Lake County

U.S. EPA, Region V

Lake County Health Department Northwest Regional Office

Air Compliance Section Inspector - Rick Massoels

Compliance Data Section - Karen Nowak

Administrative and Development - Janet Mobley Technical Support and Modeling - Michele Boner

# MINOR SOURCE OPERATING PERMIT OFFICE OF AIR QUALITY

# W.R. Grace and Co. - Conn. 5215 Kennedy Avenue East Chicago, Indiana 46312

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the emission units described in Section A (Source Summary) of this permit.

This permit is issued to the above mentioned company under the provisions of 326 IAC 2-1.1, 326 IAC 2-6.1 and 40 CFR 52.780, with conditions listed on the attached pages.

Operation Permit No.: MSOP 089-8847-00310			
sued by: aul Dubenetzky, Branch Chief ffice of Air Quality  Issuance Date: March 30, 2001  Expiration Date: March 30, 2006			
Notice-only Change 089-14372-00310	Conditions Affected: A.1, A.2, C.6, C.9, C.18, Natural Gas-Fired Boiler Certification Form and Annual Notification Form		
Issued by: Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: June 12, 2001 Expiration Date: June 12, 2006		

Page 2 of 27 MSOP 089-8847-00310

#### **TABLE OF CONTENTS**

Α	SOL	JRCE	SHM	ΙΜΔ	RY
_	-	JI\U_	2014		

- A.1 General Information [326 IAC 2-5.1-3(c)] [326 IAC 2-6.1-4(a)]
- A.2 Emissions Units and Pollution Control Equipment Summary

#### B GENERAL CONSTRUCTION CONDITIONS

- B.1 Permit No Defense [IC 13]
- B.2 Definitions
- B.3 Effective Date of the Permit [IC 13-15-5-3]
- B.4 Modification of Permits [326 IAC 2]

#### C SOURCE OPERATION CONDITIONS

- C.1 PSD, Emission Offset and Part 70 Minor Source Status [326 IAC 2-2] [40 CFR 52.21] [326 IAC 2-3] [326 IAC 2-7]
- C.2 Preventive Maintenance Plan [326 IAC 1-6-3]
- C.3 Permit Revision [326 IAC 2-5.1-3(e)(3)] [326 IAC 2-6.1-6]
- C.4 Inspection and Entry [326 IAC 2-5.1-3(e)(4)(B)] [326 IAC 2-6.1-5(a)(4)]
- C.5 Transfer of Ownership or Operation [326 IAC 2-6.1-6(d)(3)]
- C.6 Permit Revocation [326 IAC 2-1.1-9]
- C.7 Opacity [326 IAC 5-1]
- C.8 Fugitive Dust Emissions [326 IAC 6-4]
- C.9 Nonattainment area particulate limitations; Lake County particulate matter contingency measures [326 IAC 6-1-11.2]
- C.10 Performance Testing [326 IAC 3-6] [326 IAC 2-1.1-11]
- C.11 Monitoring Methods [326 IAC 3]
- C.12 Compliance Monitoring Plan Failure to Take Response Steps [326 IAC 1-6]
- C.13 Actions Related to Noncompliance Demonstrated by a Stack Test

# **Record Keeping and Reporting Requirements**

- C.14 Malfunctions Report [326 IAC 1-6-2]
- C.15 Annual Emission Statement [326 IAC 2-6]
- C.16 Monitoring Data Availability [326 IAC 2-6.1-2] [IC 13-14-1-13]
- C.17 General Record Keeping Requirements [326 IAC 2-6.1-2]
- C.18 General Reporting Requirements [326 IAC 2-1.1-11] [326 IAC 2-6.1-2] [IC 13-14-1-13]
- C.19 Annual Notification [326 IAC 2-6.1-5(a)(5)]

# D.1 EMISSIONS OPERATION CONDITIONS: One (1) Sodium Silicate Furnace

#### Emission Limitations and Standards [326 IAC 2-6.1-5(1)]

- D.1.1 Particulate Matter Limitation (PM<sub>10</sub>) [326 IAC 6-1-10.1]
- D.1.2 Sulfur Dioxide Emission Limitations (SO<sub>2</sub>) [326 IAC 7-4-1.1]

# Compliance Determination Requirements [326 IAC 2-1.1-11]

D.1.3 Testing Requirements [326 IAC 3-6]

#### D.2 EMISSIONS OPERATION CONDITIONS: Three (3) boilers

#### **Emission Limitations and Standards [326 IAC 2-6.1-5(1)]**

- D.2.1 Particulate Matter Limitation (PM) [326 IAC 6-1-10.1]
- D.2.2 Sulfur Dioxide Emission Limitations (SO<sub>2</sub>) [326 IAC 7-4-1.1]

Page 3 of 27 MSOP 089-8847-00310

# Record Keeping and Reporting Requirements [326 IAC 2-5.1-3(e)(2)] [326 IAC 2-6.1-5(a)(2)]

D.2.3 Reporting Requirements

# D.3 EMISSIONS OPERATION CONDITIONS: Two (2) backup generators

# Emission Limitations and Standards [326 IAC 2-6.1-5(1)]

- D.3.1 Particulate Matter Limitation (PM) [326 IAC 6-1-2]
- D.3.2 Particulate Matter Limitation (PM) [326 IAC 6-1-2]
- D.3.3 Sulfur Dioxide Emission Limitations (SO<sub>2</sub>) [326 IAC 7-4-1.1]

# D.4 EMISSIONS UNIT OPERATION CONDITIONS: Process Operations and Storage Tanks

# Emission Limitations and Standards [326 IAC 2-6.1-5(1)]

- D.4.1 Particulate Matter (PM) [326 IAC 6-1-2]
- D.4.2 Fugitive Particulate Matter (PM) [326 IAC 5-1] [326 IAC 6-4]
- D.4.3 Volatile Organic Compounds (VOC)
- D.4.4 Volatile Organic Compounds (VOC)

# **Natural Gas-Fired Boiler Certification**

**Malfunction Report** 

**Annual Report** 

Notice-only 089-14372-00310 Changed by: MES

Page 4 of 27 MSOP 089-8847-00310

#### **SECTION A**

#### **SOURCE SUMMARY**

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 and A.2 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

#### General Information [326 IAC 2-5.1-3(c)] [326 IAC 2-6.1-4(a)]

The Permittee owns and operates a stationary sodium silicate solution and Ludox manufacturing source.

Authorized Individuals: Patricia M. Winkley, Bess Y. Hwang and Charles J. Tuskan Source Address: 5215 Kennedy Avenue, East Chicago, Indiana 46312

Mailing Address: 5215 Kennedy Avenue, East Chicago, Indiana 46312

Phone Number: 219-391-4647

SIC Code: 2819 County Location: Lake

Nonattainment for PM<sub>10</sub>, SO<sub>2</sub> and Ozone County Status:

Attainment area for all other criteria pollutants

Minor Source Operating Permit Source Status:

Minor Source, under PSD and Emission Offset Rules: Minor Source, Section 112 of the Clean Air Act

#### Emissions Units and Pollution Control Equipment Summary A.2

This stationary source is approved to operate the following emissions units and pollution control devices:

- (a) One (1) Sodium Silicate Furnace, known as EU-01, installed in 1902, using natural gas as fuel and exhausting through stack S/V 01, maximum capacity: 9,600 pounds of raw material per hour and 25 million British thermal units per hour.
- (b) Three (3) Stone Johnston Boilers, known as EU-02, EU-03 and EU-04, installed in March 1986, fired by natural gas and exhausted through stacks S/V 02, S/V03 and S/V04, respectively, maximum capacity: 26.46 million British thermal units per hour, each.
- Emergency generators as follows: (c)
  - (1) One (1) EVC backup generator, identified as EU-05, installed in 1974, fired by natural gas, capacity: 0.5 million British thermal units per hour.
  - (2) One (1) Powerhouse backup generator, identified as EU-06, installed in 1971 and relocated within the source in 1984, fired by natural gas, capacity: 0.5 million British thermal units per hour.
- (d) Lime transfer and storage operations, identified as EU-07, with a 400 cubic foot storage silo and handled by pneumatic transfer, equipped with a baghouse for particulate control, maximum throughput: 0.056 ton per hour.
- (e) Sand transfer and storage operations, identified as EU-08, with a 20,409 cubic foot storage silo and handled by a bucket elevator, maximum throughput: 4.2 tons per hour.

Notice-only 089-14372-00310 Changed by: MES Page 5 of 27 MSOP 089-8847-00310

- (f) Soda Ash transfer and storage operations, identified as EU-09, with a 4,500 cubic foot storage silo and handled by pneumatic transfer, equipped with filter bags for particulate control, maximum throughput: 2.2 tons per hour.
- (g) Eight (8) sodium silicate solution storage tanks, identified as EU-10, containing only inorganic chemicals with negligible vapor pressures, capacities: 23,000 through 160,000 gallons, with solution transported to three (3) railcar loading docks and three (3) tank truck loading docks.
- (h) Nineteen (19) Ludox colloidal silica storage tanks, identified as EU-11, containing organic and inorganic chemicals with negligible vapor pressures, capacities: 5,000 through 75,000 gallons, with Ludox transported to one (1) railcar loading dock and three (3) tank truck loading docks.
- (i) The following tanks containing inorganic chemicals with negligible vapor pressures:
  - (1) One (1) aqua ammonia blowcase, identified as EU-12, installed in 1976, containing 29% aqua ammonia, capacity: 500 gallons.
  - One (1) ninety-three percent (93%) sulfuric acid storage tank, identified as EU-13, installed in 1973, capacity: 4,300 gallons.
  - One (1) ninety-three percent (93%) sulfuric acid storage tank, identified as EU-14, installed in 1963, capacity: 12,000 gallons.
  - (4) Three (3) spent regenerated acid tanks, identified as EU-15, installed in 1972, capacity: 33,000 gallons, each.
  - (5) One (1) fifty percent (50%) caustic storage tank, identified as EU-16, constructed in 1990, containing 50% sodium hydroxide, capacity: 25,000 gallons.
  - (6) One (1) fifty percent (50%) caustic storage tank, identified as EU-17, constructed in 1986, containing 50% sodium hydroxide, capacity: 4,000 gallons.
  - (7) One (1) boiler feed oxygen scavenger, identified as EU-18, installed in 1994, capacity: 550 gallons.
  - (8) One (1) boiler feed scale preventative, identified as EU-19, installed in 1994, capacity: 850 gallons.
  - (9) One (1) spent one through three percent (1-3%) sulfuric acid tank, installed in 1986, capacity 8,900 gallons.
- (j) The following tanks containing organic chemicals with negligible vapor pressures:
  - (1) One (1) solvent parts cold cleaner, identified as EU-20, installed in 1996, containing petroleum distillate and using only nonhalogenated solvents, capacity: 30 gallons.
  - One (1) cationic polymer tank, identified as EU-21, installed in 1972, capacity: 4,000 gallons.
  - (3) One (1) gasoline storage tank, identified as EU-22, installed in 1991, capacity: 270 gallons.

Notice-only 089-14372-00310 Changed by: MES Page 6 of 27 MSOP 089-8847-00310

(4) One (1) diesel storage tank, identified as EU-23, installed in 1991, capacity: 500 gallons.

Notice-only 089-14372-00310 Changed by: MES Page 7 of 27 MSOP 089-8847-00310

#### **SECTION B**

#### **GENERAL CONDITIONS**

THIS SECTION OF THE PERMIT IS BEING ISSUED UNDER THE PROVISIONS OF 326 IAC 2-1.1 AND 40 CFR 52.780, WITH CONDITIONS LISTED BELOW.

# B.1 Permit No Defense [IC 13]

This permit to operate does not relieve the Permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.

#### B.2 Definitions

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, any applicable definitions found in IC 13-11, 326 IAC 1-2, and 326 IAC 2-1.1-1 shall prevail.

# B.3 Effective Date of the Permit [IC13-15-5-3]

Pursuant to IC 13-15-5-3, this permit becomes effective upon its issuance.

# B.4 Modification to Permit [326 IAC 2]

All requirements and conditions of this operating permit shall remain in effect unless modified in a manner consistent with procedures established for modifications of operating permits pursuant to 326 IAC 2 (Permit Review Rules).

Notice-only 089-14372-00310 Changed by: MES Page 8 of 27 MSOP 089-8847-00310

#### **SECTION C**

#### **SOURCE OPERATION CONDITIONS**

#### **Entire Source**

- C.1 PSD, Emission Offset and Part 70 Minor Source Status [326 IAC 2-2] [40 CFR 52.21] [326 IAC 2-3] [326 IAC 2-7]
  - (a) Any change or modification which may increase potential to emit of PM or CO to 100 tons per year from this source, shall cause this source to be considered a major source under PSD, 326 IAC 2-2 and 40 CFR 52.21, and shall require approval from IDEM, OAQ prior to making the change.
  - (b) Any change or modification which may increase potential to emit of VOC to 25 tons per year, or PM<sub>10</sub>, NO<sub>x</sub> or SO<sub>2</sub> to 100 tons per year shall cause this source to be considered a major source pursuant to Emission Offset, 326 IAC 2-3, and shall require approval from IDEM, OAQ prior to making the change.
  - (c) Any change or modification which may increase potential to emit of VOC to 25 tons per year, 10 tons per year of any single hazardous air pollutant, 25 tons per year of any combination of hazardous air pollutants, or 100 tons per year of any other regulated pollutant from this source, shall cause this source to be considered a major source under Part 70 Permit Program, 326 IAC 2-7, and shall require approval from IDEM, OAQ prior to making the change.

#### C.2 Preventive Maintenance Plan [326 IAC 1-6-3]

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMP) after issuance of this permit, including the following information on each emissions unit:
  - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
  - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions:
  - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.
- (b) The Permittee shall implement the Preventive Maintenance Plans as necessary to ensure that failure to implement the Preventive Maintenance Plan does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (c) PMP's shall be submitted to IDEM, OAQ, upon request and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ, may require the Permittee to revise its Preventive Maintenance Plan whenever lack of proper maintenance causes or contributes to any violation.

#### C.3 Permit Revision [326 IAC 2-5.1-3(e)(3)] [326 IAC 2-6.1-6]

- (a) The Permittee must comply with the requirements of 326 IAC 2-6.1-6 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management Permits Branch, Office of Air Quality 100 North Senate Avenue, P.O. Box 6015 Indianapolis, Indiana 46206-6015

Any such application should be certified by the "authorized individual" as defined by 326 IAC 2-1.1-1.

(c) The Permittee shall notify the OAQ within thirty (30) calendar days of implementing a notice-only change. [326 IAC 2-6.1-6(d)]

#### C.4 Inspection and Entry [326 IAC 2-5.1-3(e)(4)(B)] [326 IAC 2-6.1-5(a)(4)]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

# C.5 Transfer of Ownership or Operation [326 IAC 2-6.1-6(d)(3)]

Pursuant to [326 IAC 2-6.1-6(d)(3)]:

- (a) In the event that ownership of this source is changed, the Permittee shall notify IDEM, OAQ, Permits Branch, within thirty (30) days of the change.
- (b) The written notification shall be sufficient to transfer the permit to the new owner by an notice-only change pursuant to 326 IAC 2-6.1-6(d)(3).
- (c) IDEM, OAQ, shall issue a revised permit.

The notification which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1.

#### C.6 Permit Revocation [326 IAC 2-1.1-9]

Pursuant to 326 IAC 2-1.1-9(a)(Revocation of Permits), this permit to operate may be revoked for any of the following causes:

(a) Violation of any conditions of this permit.

Page 10 of 27 MSOP 089-8847-00310

- (b) Failure to disclose all the relevant facts, or misrepresentation in obtaining this permit.
- (c) Changes in regulatory requirements that mandate either a temporary or permanent reduction of discharge of contaminants. However, the amendment of appropriate sections of this permit shall not require revocation of this permit.
- (d) Noncompliance with orders issued pursuant to 326 IAC 1-5 (Episode Alert Levels) to reduce emissions during an air pollution episode.
- (e) For any cause which establishes in the judgment of IDEM, the fact that continuance of this permit is not consistent with purposes of this article.

#### C.7 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary alternative opacity limitations), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of twenty percent (20%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor in a six (6) hour period.

#### C.8 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.

C.9 Nonattainment area particulate limitations; Lake County particulate matter contingency measures [326 IAC 6-1-11.2]

This source shall comply with the requirements of 326 IAC 6-1-11.2 (Nonattainment area particulate limitations: Lake County particulate matter contingency measures).

#### **Testing Requirements**

#### C.10 Performance Testing [326 IAC 3-6] [326 IAC 2-1.1-11]

(a) Compliance testing on new emissions units shall be conducted within 60 days after achieving maximum production rate, but no later than 180 days after initial start-up, if specified in Section D of this approval. All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management Compliance Data Section, Office of Air Quality 100 North Senate Avenue, P. O. Box 6015 Indianapolis, Indiana 46206-6015

Page 11 of 27 MSOP 089-8847-00310

no later than thirty-five (35) days prior to the intended test date. The Permittee shall submit a notice of the actual test date to the above address so that it is received at least two weeks prior to the test date.

(b) All test reports must be received by IDEM, OAQ, within forty-five (45) days after the completion of the testing. An extension may be granted by the IDEM, OAQ, if the source submits to IDEM, OAQ, a reasonable written explanation within five (5) days prior to the end of the initial forty-five (45) day period.

The documentation submitted by the Permittee does not require certification by the "authorized individual" as defined by 326 IAC 2-1.1-1.

# **Compliance Monitoring Requirements**

# C.11 Monitoring Methods [326 IAC 3]

Any monitoring or testing required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, or other approved methods as specified in this permit.

#### C.12 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 1-6]

- (a) The Permittee is required to implement a compliance monitoring plan to ensure that reasonable information is available to evaluate its continuous compliance with applicable requirements. This compliance monitoring plan is comprised of:
  - (1) This condition;
  - (2) The Compliance Determination Requirements in Section D of this permit;
  - (3) The Compliance Monitoring Requirements in Section D of this permit;
  - (4) The Record Keeping and Reporting Requirements in Section C (Monitoring Data Availability, General Record Keeping Requirements, and General Reporting Requirements) and in Section D of this permit; and
  - (5) A Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. CRP's shall be submitted to IDEM, OAQ upon request and shall be subject to review and approval by IDEM, OAQ. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee and maintained on site, and is comprised of:
    - (A) Response steps that will be implemented in the event that compliance related information indicates that a response step is needed pursuant to the requirements of Section D of this permit; and
    - (B) A time schedule for taking such response steps including a schedule for devising additional response steps for situations that may not have been predicted.

Notice-only 089-14372-00310 Changed by: MES Page 12 of 27 MSOP 089-8847-00310

- (b) For each compliance monitoring condition of this permit, appropriate response steps shall be taken when indicated by the provisions of that compliance monitoring condition. Failure to perform the actions detailed in the compliance monitoring conditions or failure to take the response steps within the time prescribed in the Compliance Response Plan, shall constitute a violation of the permit unless taking the response steps set forth in the Compliance Response Plan would be unreasonable.
- (c) After investigating the reason for the excursion, the Permittee is excused from taking further response steps for any of the following reasons:
  - (1) The monitoring equipment malfunctioned, giving a false reading. This shall be an excuse from taking further response steps providing that prompt action was taken to correct the monitoring equipment.
  - (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied or:
  - (3) An automatic measurement was taken when the process was not operating; or
  - (4) The process has already returned to operating within "normal" parameters and no response steps are required.
- (d) Records shall be kept of all instances in which the compliance related information was not met and of all response steps taken.

# C.13 Actions Related to Noncompliance Demonstrated by a Stack Test

- (a) When the results of a stack test performed in conformance with Section C Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate corrective actions. The Permittee shall submit a description of these corrective actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize emissions from the affected emissions unit while the corrective actions are being implemented. IDEM, OAQ shall notify the Permittee within thirty (30) days, if the corrective actions taken are deficient. The Permittee shall submit a description of additional corrective actions taken to IDEM, OAQ within thirty (30) days of receipt of the notice of deficiency. IDEM, OAQ reserves the authority to use enforcement activities to resolve noncompliant stack tests.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline. Failure of the second test to demonstrate compliance with the appropriate permit conditions may be grounds for immediate revocation of the permit to operate the affected emissions unit.

The documents submitted pursuant to this condition do not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1.

# **Record Keeping and Reporting Requirements**

- (a) A record of all malfunctions, including startups or shutdowns of any facility or emission control equipment, which result in violations of applicable air pollution control regulations or applicable emission limitations shall be kept and retained for a period of three (3) years and shall be made available to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) or appointed representative upon request.
- (b) When a malfunction of any facility or emission control equipment occurs which lasts more than one (1) hour, said condition shall be reported to OAQ, using the Malfunction Report Forms (2 pages). Notification shall be made by telephone or facsimile, as soon as practicable, but in no event later than four (4) daytime business hours after the beginning of said occurrence.
- (c) Failure to report a malfunction of any emission control equipment shall constitute a violation of 326 IAC 1-6, and any other applicable rules. Information of the scope and expected duration of the malfunction shall be provided, including the items specified in 326 IAC 1-6-2(a) (1) through (6).
- (d) Malfunction is defined as any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner. [326 IAC 1-2-39]

# C.15 Annual Emission Statement [326 IAC 2-6]

- (a) The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6, that must be received by April 15 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements:
  - (1) Indicate actual emissions of criteria pollutants from the source, in compliance with 326 IAC 2-6 (Emission Reporting);
  - (2) Indicate actual emissions of other regulated pollutants from the source, for purposes of Part 70 fee assessment.
- (b) The annual emission statement covers the twelve (12) consecutive month time period starting December 1 and ending November 30. The annual emission statement must be submitted to:

Indiana Department of Environmental Management Technical Support and Modeling Section, Office of Air Quality 100 North Senate Avenue, P. O. Box 6015 Indianapolis, Indiana 46206-6015

(c) The annual emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

The submittal by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1.

Notice-only 089-14372-00310 Changed by: MES Page 14 of 27 MSOP 089-8847-00310

# C.16 Monitoring Data Availability [326 IAC 2-6.1-2] [IC 13-14-1-13]

- (a) With the exception of performance tests conducted in accordance with Section C- Performance Testing, all observations, sampling, maintenance procedures, and record keeping, required as a condition of this permit shall be performed at all times the equipment is operating at normal representative conditions.
- (b) As an alternative to the observations, sampling, maintenance procedures, and record keeping of subsection (a) above, when the equipment listed in Section D of this permit is not operating, the Permittee shall either record the fact that the equipment is shut down or perform the observations, sampling, maintenance procedures, and record keeping that would otherwise be required by this permit.
- (c) If the equipment is operating but abnormal conditions prevail, additional observations and sampling should be taken with a record made of the nature of the abnormality.
- (d) If for reasons beyond its control, the operator fails to make required observations, sampling, maintenance procedures, or record keeping, reasons for this must be recorded.
- (e) At its discretion, IDEM may excuse such failure providing adequate justification is documented and such failures do not exceed five percent (5%) of the operating time in any quarter.
- (f) Temporary, unscheduled unavailability of staff qualified to perform the required observations, sampling, maintenance procedures, or record keeping shall be considered a valid reason for failure to perform the requirements stated in (a) above.

# C.17 General Record Keeping Requirements [326 IAC 2-6.1-2]

- (a) Records of all required monitoring data and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years and available upon the request of an IDEM, OAQ, representative. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a written request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Records of required monitoring information shall include, where applicable:
  - (1) The date, place, and time of sampling or measurements;
  - (2) The dates analyses were performed;
  - (3) The company or entity performing the analyses;
  - (4) The analytic techniques or methods used;
  - (5) The results of such analyses; and
  - (6) The operating conditions existing at the time of sampling or measurement.
- (c) Support information shall include, where applicable:
  - (1) Copies of all reports required by this permit;

Notice-only 089-14372-00310 Changed by: MES Page 15 of 27 MSOP 089-8847-00310

- (2) All original strip chart recordings for continuous monitoring instrumentation;
- (3) All calibration and maintenance records;
- (4) Records of preventive maintenance shall be sufficient to demonstrate that failure to implement the Preventive Maintenance Plan did not cause or contribute to a violation of any limitation on emissions or potential to emit. To be relied upon subsequent to any such violation, these records may include, but are not limited to: work orders, parts inventories, and operator's standard operating procedures. Records of response steps taken shall indicate whether the response steps were performed in accordance with the Compliance Response Plan required by Section C Compliance Monitoring Plan Failure to take Response Steps, of this permit, and whether a deviation from a permit condition was reported. All records shall briefly describe what maintenance and response steps were taken and indicate who performed the tasks.
- (d) All record keeping requirements not already legally required shall be implemented when operation begins.

# C.18 General Reporting Requirements [326 IAC 2-1.1-11] [326 IAC 2-6.1-2] [IC 13-14-1-13]

(a) The reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management Compliance Data Section, Office of Air Quality 100 North Senate Avenue, P. O. Box 6015 Indianapolis, Indiana 46206-6015

- (b) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (c) Unless otherwise specified in this permit, any semi-annual report shall be submitted within thirty (30) days of the end of the reporting period. The reports do not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (d) All instances of deviations must be clearly identified in such reports. A reportable deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:
  - (1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or
  - (2) A malfunction as described in 326 IAC 1-6-2; or
  - (3) Failure to implement elements of the Preventive Maintenance Plan unless lack of maintenance has caused or contributed to a deviation.
  - (4) Failure to make or record information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar guarter.

A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred or failure to monitor or record the required compliance monitoring is a deviation.

- (e) Any corrective actions or response steps taken as a result of each deviation must be clearly identified in such reports.
- (f) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period.

#### C.19 Annual Notification [326 IAC 2-6.1-5(a)(5)]

- (a) Annual notification shall be submitted to the Office of Air Quality stating whether or not the source is in operation and in compliance with the terms and conditions contained in this permit.
- (b) Noncompliance with any condition must be specifically identified. If there are any permit conditions or requirements for which the source is not in compliance at any time during the year, the Permittee must provide a narrative description of how the source did or will achieve compliance and the date compliance was, or will be, achieved. The notification must be signed by an authorized individual.
- (c) The annual notice shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in the format attached no later than March 1 of each year to:

Compliance Data Section, Office of Air Quality Indiana Department of Environmental Management 100 North Senate Avenue, P.O. Box 6015 Indianapolis, IN 46206-6015

(d) The notification shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

#### SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

#### **Emissions Unit Description:**

(a) One (1) Sodium Silicate Furnace, known as EU-01, installed in 1902, using natural gas as fuel and exhausting through stack S/V 01, maximum capacity: 9,600 pounds of raw material per hour and 25 million British thermal units per hour.

(The information describing the process contained in this emissions unit description box is descriptive information and does not constitute enforceable conditions.)

#### Emission Limitations and Standards [326 IAC 2-6.1-5(1)]

# D.1.1 Particulate Matter Limitation (PM<sub>10</sub>) [326 IAC 6-1-10.1]

- (a) Pursuant to 326 IAC 6-1-10.1(d) (Nonattainment area particulate limitations: Lake County PM<sub>10</sub> emission requirements), the one (1) Sodium Silicate Furnace, known as EU-01, shall limit PM<sub>10</sub> emissions to 1.439 pounds per ton and 6.0 pounds per hour.
- (b) Pursuant to 326 IAC 6-1-10.1(I), a continuous compliance plan (CCP) was submitted for the sodium silicate furnace on December 10, 1993. The CCP shall meet the requirements of 326 IAC 6-1-10.1(m) and (n). The source shall also comply with the requirements of 326 IAC 6-1-10.1(s), (t), (u) and (v), which outline the requirements for maintaining the CCP and complying with this rule.

# D.1.2 Sulfur Dioxide Emission Limitations (SO<sub>2</sub>) [326 IAC 7-4-1.1]

The one (1) Sodium Silicate Furnace shall only burn natural gas as fuel. Therefore, the facility will comply with the requirements of 326 IAC 7-4-1.1 (Sulfur Dioxide Emission Limitations: Lake County).

# Compliance Determination Requirements [326 IAC 2-1.1-11]

# D.1.3 Testing Requirements [326 IAC 3-6]

- (a) During the period between 30 and 36 months after issuance of this permit, in order to demonstrate compliance with Condition D.1.1(a), the Permittee shall perform PM<sub>10</sub> testing utilizing methods as approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. PM<sub>10</sub> includes filterable and condensible PM<sub>10</sub>. Testing shall be conducted in accordance with Section C- Performance Testing.
- (b) During the period between 30 and 36 months after issuance of this permit, in order to demonstrate compliance with Condition C.1(b) and C.1(c), the Permittee shall perform NO<sub>X</sub> testing to verify that the NO<sub>X</sub> emission rate of the furnace is no more than 100 pounds per million cubic feet of natural gas input, utilizing methods as approved by the Commissioner. Testing shall be conducted in accordance with Section C- Performance Testing.
- (c) If the emission factor determined in the NO<sub>x</sub> stack test is greater than 100 pounds per million cubic feet of natural gas input, the Permittee shall be required to use that emission factor to compute emissions, and if that emission factor results in a potential to emit NO<sub>x</sub> greater than 100 tons per year from the entire source, the Permittee shall submit a Part 70 application pursuant to 326 IAC 2-7, or a FESOP application pursuant to 326 IAC 2-8, within one (1) year of completion of a valid stack test.

Notice-only 089-14372-00310 Changed by: MES Page 18 of 27 MSOP 089-8847-00310

#### SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

# **Emissions Unit Description:**

(b) Three (3) Stone Johnston Boilers, known as EU-02, EU-03 and EU-04, installed in March 1986, fired by natural gas and exhausted through stacks S/V 02, S/V03 and S/V04, respectively, maximum capacity: 26.46 million British thermal units per hour, each.

(The information describing the process contained in this emissions unit description box is descriptive information and does not constitute enforceable conditions.)

#### Emission Limitations and Standards [326 IAC 2-6.1-5(1)]

#### D.2.1 Particulate Matter Limitation (PM) [326 IAC 6-1-10.1]

Pursuant to 326 IAC 6-1-10.1(h), the three (3) Stone Johnston boilers in the Powerhouse shall fire natural gas only. Each boiler has PM emissions of 0.050 pounds per hour and PM<sub>10</sub> emissions of 0.201 pounds per hour according to the current AP-42 emission factors.

# D.2.2 Sulfur Dioxide Emission Limitations (SO<sub>2</sub>) [326 IAC 7-4-1.1]

The three (3) Stone Johnston boilers shall only burn natural gas as fuel. Therefore, the facilities will comply with the requirements of 326 IAC 7-4-1.1 (Sulfur Dioxide Emission Limitations: Lake County).

# Record Keeping and Reporting Requirements [326 IAC 2-5.1-3(e)(2)] [326 IAC 2-6.1-5(a)(2)]

#### D.2.3 Reporting Requirements

The natural gas fired boiler certification, shall be submitted to the address listed in Section C - General Reporting Requirements, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the six (6) month period being reported.

Page 19 of 27 MSOP 089-8847-00310

#### SECTION D.3 EMISSIONS UNIT OPERATION CONDITIONS

# **Emissions Unit Description:**

- (c) Emergency generators as follows:
  - (1) One (1) EVC backup generator, identified as EU-05, installed in 1974, fired by natural gas, capacity: 0.5 million British thermal units per hour.
  - (2) One (1) Powerhouse backup generator, identified as EU-06, installed in 1971 and relocated within the source in 1984, fired by natural gas, capacity: 0.5 million British thermal units per hour.

(The information describing the process contained in this emissions unit description box is descriptive information and does not constitute enforceable conditions.)

# Emission Limitations and Standards [326 IAC 2-6.1-5(1)]

#### D.3.1 Particulate Matter Limitation (PM) [326 IAC 6-1-2]

Pursuant to 326 IAC 6-1-2, the PM from the power house backup generator shall not exceed 0.03 grain per dry standard cubic foot.

# D.3.2 Particulate Matter Limitation (PM) [326 IAC 6-1-2]

Pursuant to 326 IAC 6-1-2, the PM from the one (1) EVC backup generator shall not exceed 0.03 grain per dry standard cubic foot.

#### D.3.3 Sulfur Dioxide Emission Limitations (SO<sub>2</sub>) [326 IAC 7-4-1.1]

The two (2) backup generators shall only burn natural gas as fuel. Therefore, the facilities will comply with the requirements of 326 IAC 7-4-1.1 (Sulfur Dioxide Emission Limitations: Lake County).

#### SECTION D.4 EMISSIONS UNIT OPERATION CONDITIONS

### **Emissions Unit Description:**

- (d) Lime transfer and storage operations, identified as EU-07, with a 400 cubic foot storage silo and handled by pneumatic transfer, equipped with a baghouse for particulate control, maximum throughput: 0.056 ton per hour.
- (e) Sand transfer and storage operations, identified as EU-08, with a 20,409 cubic foot storage silo and handled by a bucket elevator, maximum throughput: 4.2 tons per hour.
- (f) Soda Ash transfer and storage operations, identified as EU-09, with a 4,500 cubic foot storage silo and handled by pneumatic transfer, equipped with filter bags for particulate control, maximum throughput: 2.2 tons per hour.
- (g) Eight (8) sodium silicate solution storage tanks, identified as EU-10, containing only inorganic chemicals with negligible vapor pressures, capacities: 23,000 through 160,000 gallons, with solution transported to three (3) railcar loading docks and three (3) tank truck loading docks.
- (h) Nineteen (19) Ludox colloidal silica storage tanks, identified as EU-11, containing organic and inorganic chemicals with negligible vapor pressures, capacities: 5,000 through 75,000 gallons, with Ludox transported to one (1) railcar loading dock and three (3) tank truck loading docks.
- (i) The following storage tanks containing inorganic chemicals with negligible vapor pressures:
  - (1) One (1) aqua ammonia blowcase, identified as EU-12, installed in 1976, containing 29% aqua ammonia, capacity: 500 gallons.
  - One (1) ninety-three percent (93%) sulfuric acid storage tank, identified as EU-13, installed in 1973, capacity: 4,300 gallons.
  - One (1) ninety-three percent (93%) sulfuric acid storage tank, identified as EU-14, installed in 1963, capacity: 12,000 gallons.
  - (4) Three (3) spent regenerated acid tanks, identified as EU-15, installed in 1972, capacity: 33,000 gallons, each.
  - One (1) fifty percent (50%) caustic storage tank, identified as EU-16, constructed in 1990, containing 50% sodium hydroxide, capacity: 25,000 gallons.
  - One (1) fifty percent (50%) caustic storage tank, identified as EU-17, constructed in 1986, containing 50% sodium hydroxide, capacity: 4,000 gallons.
  - (7) One (1) boiler feed oxygen scavenger, identified as EU-18, installed in 1994, capacity: 550 gallons.
  - (8) One (1) boiler feed scale preventative, identified as EU-19, installed in 1994, capacity: 850 gallons.
  - (9) One (1) spent one through three percent (1-3%) sulfuric acid tank, installed in 1986, capacity 8,900 gallons.

#### SECTION D.4, Continued EMISSIONS UNIT OPERATION CONDITIONS

#### **Emissions Unit Description:**

- (j) The following storage tanks containing organic chemicals with negligible vapor pressures:
  - (1) One (1) solvent parts cold cleaner, identified as EU-20, installed in 1996, containing petroleum distillate and using only nonhalogenated solvents, capacity: 30 gallons.
  - (2) One (1) cationic polymer tank, identified as EU-21, installed in 1972, capacity: 4,000 gallons.
  - (3) One (1) gasoline storage tank, identified as EU-22, installed in 1991, capacity: 270 gallons.
  - (4) One (1) diesel storage tank, identified as EU-23, installed in 1991, capacity: 500 gallons.

(The information describing the process contained in this emissions unit description box is descriptive information and does not constitute enforceable conditions.)

# Emission Limitations and Standards [326 IAC 2-6.1-5(1)]

# D.4.1 Particulate Matter (PM) [326 IAC 6-1-2]

Pursuant to 326 IAC 6-1-2, the filters bags controlling the lime transfer and storage operations, identified as EU-07, sand transfer and storage operations, identified as EU-08, and soda ash transfer and storage operations, identified as EU-09, shall not allow or permit discharge to the atmosphere of any gases which contain PM in excess of 0.03 grain per dry standard cubic foot.

#### D.4.2 Fugitive Particulate Matter (PM) [326 IAC 5-1] [326 IAC 6-4]

The fugitive emissions from these facilities shall comply with the requirements of 326 IAC 5-1 and 326 IAC 6-4, as described in Section C of this permit.

# D.4.3 Volatile Organic Compounds (VOC)

Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations), the owner or operator shall:

- (a) Equip the cleaner with a cover;
- (b) Equip the cleaner with a facility for draining cleaned parts;
- (c) Close the degreaser cover whenever parts are not being handled in the cleaner;
- (d) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;
- (e) Provide a permanent, conspicuous label summarizing the operation requirements;
- (f) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

# D.4.4 Volatile Organic Compounds (VOC)

(a) Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaner degreaser facility without a remote solvent reservoir, construct-

ed after January 1, 1990, shall ensure that the following control equipment requirements are met:

- (1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:
  - (A) The solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius (38EC) (one hundred degrees Fahrenheit (100EF));
  - (B) The solvent is agitated; or
  - (C) The solvent is heated.
- (2) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38EC) (one hundred degrees Fahrenheit (100EF)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.
- (3) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).
- (4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.
- (5) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38EC) (one hundred degrees Fahrenheit (100EF)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9EC) (one hundred twenty degrees Fahrenheit (120EF)):
  - (A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.
  - (B) A water cover when solvent is used is insoluble in, and heavier than, water.
  - (C) Other systems of demonstrated equivalent control such as a refrigerated chiller of carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.
- (b) Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaning facility shall ensure that the following operating requirements are met:
  - (1) Close the cover whenever articles are not being handled in the degreaser.
  - (2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.

Notice-only 089-14372-00310 Changed by: MES Page 23 of 27 MSOP 089-8847-00310

(3) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.

Notice-only 089-14372-00310 Changed by: MES Page 24 of 27 MSOP 089-8847-00310

# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR QUALITY COMPLIANCE DATA SECTION

# MINOR SOURCE OPERATING PERMIT NATURAL GAS FIRED BOILER CERTIFICATION

Source Name: W.R. Grace and Co. - Conn.

Source Address: 5215 Kennedy Avenue, East Chicago, Indiana 46312 Mailing Address: 5215 Kennedy Avenue, East Chicago, Indiana 46312

MSOP No.: 089-8847-00310

9	Natural Gas Only	
9	Alternate Fuel burned	i
	From:	_ To:
		formation and belief formed after reasonable inquiry, the statements and are true, accurate, and complete.
Si	gnature:	
Pr	rinted Name:	
Ti	tle/Position:	
Pł	none:	
Da	ate:	

# **MALFUNCTION REPORT**

# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR QUALITY FAX NUMBER - 317 233-5967

This form should only be used to report malfunctions applicable to Rule 326 IAC 1-6

and to qualify for the exemption under 326 IAC 1-6-4.			
THIS FACILITY MEETS THE APPLICABILITY REQUES ARTICULATE MATTER?, 25 TONS/YEAR SU 25 TONS/YEAR VOC?, 25 TONS/YEAR HYDE?, 25 TONS/YEAR REDUCED SULFUR COMPLICATION MONOXIDE?, 10 TONS/YEAR ANY COMBINATION HAZARDOUS AIR POLLUTANT?_ELEMENTAL LEAD?, OR IS A SOURCE MALFUNCTIONING CONTROL EQUIPMENT OR PROLIMITATION	JLFUR DIOXIDE ?, 25 T ROGEN SULFIDE ?, 25 T OUNDS ?, 25 TONS/YEA SINGLE HAZARDOUS AIR PO , 1 TON/YEAR LEAD OF LISTED UNDER 326 IAC 2	ONS/YEAR NITROGEN OF CONS/YEAR TOTAL RED IN THE CONSTRUCTION OF TH	OXIDES ?, UCED SULFUR 00 TONS/YEAR ONS/YEAR ANY MEASURED AS SSIONS FROM
THIS MALFUNCTION RESULTED IN A VIOLATION C PERMIT LIMIT OF	OF: 326 IAC OR, PERM	/IIT CONDITION #	_ AND/OR
THIS INCIDENT MEETS THE DEFINITION OF 'MALF	UNCTION' AS LISTED ON REV	/ERSE SIDE ? Y	N
THIS MALFUNCTION IS OR WILL BE LONGER THAN	N THE ONE (1) HOUR REPORT	TING REQUIREMENT?	Y N
COMPANY: LOCATION: (CITY AND COUNTY) PERMIT NO AFS PLANT ID: CONTROL/PROCESS DEVICE WHICH MALFUNCTION	PHONE NO. :AFS POINT ID: NED AND REASON:	INSP:	
DATE/TIME MALFUNCTION STARTED:// ESTIMATED HOURS OF OPERATION WITH MALFUNC			
DATE/TIME CONTROL EQUIPMENT BACK-IN S	SERVICE/ 20	)	AM / PM
TYPE OF POLLUTANTS EMITTED: TSP, PM-1	0, SO2, VOC, OTHER:		
ESTIMATED AMOUNT OF POLLUTANT EMITTED	D DURING MALFUNCTION:		
MEASURES TAKEN TO MINIMIZE EMISSIONS:			
REASONS WHY FACILITY CANNOT BE SHUTDO CONTINUED OPERATION REQUIRED TO PROVIDE E CONTINUED OPERATION NECESSARY TO PREVENT CONTINUED OPERATION NECESSARY TO PREVENT INTERIM CONTROL MEASURES: (IF APPLICABLE)	ESSENTIAL* SERVICES: T INJURY TO PERSONS: T SEVERE DAMAGE TO EQUI		
MALFUNCTION REPORTED BY:(SIGN	ATURE IF FAXED)	TITLE:	
MALFUNCTION RECORDED BY:	DATE:	TIME:	

\*SEE PAGE 2

Notice-only 089-14372-00310 Changed by: MES Page 26 of 27 MSOP 089-8847-00310

Please note - This form should only be used to report malfunctions applicable to Rule 326 IAC 1-6 and to qualify for the exemption under 326 IAC 1-6-4.

# 326 IAC 1-6-1 Applicability of rule

Sec. 1. This rule applies to the owner or operator of any facility required to obtain a permit under 326 IAC 2-5.1 or 326 IAC 2-6.1.

# 326 IAC 1-2-39 "Malfunction" definition

- Sec. 39. Any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner.
- \* <u>Essential services</u> are interpreted to mean those operations, such as, the providing of electricity by power plants. Continued operation solely for the economic benefit of the owner or operator shall not be sufficient reason why a facility cannot be shutdown during a control equipment shutdown.

If this item is checked on the front, please explain rationale:			

Notice-only 089-14372-00310 Changed by: MES Page 27 of 27 MSOP 089-8847-00310

W.R. Grace and Co. - Conn. East Chicago, Indiana Permit Reviewer: CAO/MES

**Company Name:** 

# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR QUALITY COMPLIANCE DATA SECTION

# MINOR SOURCE OPERATING PERMIT ANNUAL NOTIFICATION

This form should be used to comply with the notification requirements under 326 IAC 2-6.1-5(a)(5).

W.R. Grace and Co. - Conn.

Address:	5215 Kennedy Avenue,	5215 Kennedy Avenue,		
City:	East Chicago, Indiana	East Chicago, Indiana 46312		
Phone #:	219-391-4647	219-391-4647		
MSOP #:	MSOP 089-8847-00310			
I hereby certify that V	V.R. Grace and Co Conn. is	<ul><li>9 still in operation.</li><li>9 no longer in operation.</li></ul>		
I hereby certify that W.R. Grace and Co Conn. is		<ul> <li>9 in compliance with the requirements of MSOP 089-8847-00310.</li> <li>9 not in compliance with the requirements of MSOP 089-8847-00310.</li> </ul>		
Authorized Individ	ual (typed):			
Title:				
Signature:				
Date:				
If there are any conditions or requirements for which the source is not in compliance, provide a narrative description of how the source did or will achieve compliance and the date compliance was, or will be achieved.				
Noncompliance:				